

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**LUIS R. CRUZ-COSS**

PLAINTIFF

VS.

**MR SUN CONCRETE, INC.;**  
**INSURANCE COMPANY XYZ;**  
**COMPANY ABC;**  
**JOHN & JANE DOE.**

DEFENDANTS

CIVIL NO. 21-1064

RETALIATION,  
AND TORT DAMAGES

TRIAL BY JURY DEMANDED

**JOINT NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE**

**TO THE HONORABLE COURT:**

COMES NOW, **Luis R. Cruz-Coss** (“Plaintiff”), **Mr Sun Concrete** (“MS Concrete”) and **Universal Insurance Company** (“Universal”) (jointly “Parties”) through the undersigned attorney and very respectfully states, alleges and prays as follows:

1. Pursuant to Fed. R. Civ. P. 41(a)(1) the Parties to this action, through their respective counsel, have conferred and stipulated to dismiss this action with prejudice.

2. Accordingly, the Parties request the voluntary dismissal with prejudice of all claims of Plaintiff against Defendants, MS Concrete and Universal.

3. Finally, the Parties request that the Judgment issued by this Honorable Court be final and unappealable from the date that it is entered and notified by the Clerk of the Court.

**WHEREFORE**, the Parties very respectfully pray that this Honorable Court dismiss the instant action on its entirety with prejudice without imposition of costs and attorney’s fees.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

**RESPECTFULLY SUBMITTED:** In San Juan, Puerto Rico, on this 16<sup>th</sup> day of August, 2022.

**/S/VICTOR M. RIVERA-RIOS**

VICTOR M. RIVERA-RIOS

USDC BAR NUMBER 301202

1420 FERNANDEZ JUNCOS AVE

SAN JUAN, PR 00909

Tel: (787) 727-5710

Fax: (787) 268-1835

Cel: (787) 565-3477

E-Mail: [victorriverarios@rcrtrblaw.com](mailto:victorriverarios@rcrtrblaw.com)  
[info.vrr@rcrtrblaw.com](mailto:info.vrr@rcrtrblaw.com)

SANTORI AYMAT & RIVERA, LLC

PO Box 19115

San Juan, P.R. 00910

Tel: (787) 523-4030

Fax: (787) 523-4031

E-M: [debbie.rivera@sarlawpr.com](mailto:debbie.rivera@sarlawpr.com)

[paulina.mendez@sarlawpr.com](mailto:paulina.mendez@sarlawpr.com)

**/S/DEBBIE E. RIVERA RIVERA**

USDC-PR-219409

**/S/PAULINA MÉNDEZ GORDILS**

USDC-PR 307507